

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

TEXAS, WISCONSIN, ALABAMA,  
ARKANSAS, ARIZONA, FLORIDA, GEORGIA,  
INDIANA, KANSAS, LOUISIANA, PAUL  
LePAGE, Governor of Maine, MISSISSIPPI, by  
and through Governor Phil Bryant, MISSOURI,  
NEBRASKA, NORTH DAKOTA, SOUTH  
CAROLINA, SOUTH DAKOTA, TENNESSEE,  
UTAH, and WEST VIRGINIA,

Plaintiffs,

v.

UNITED STATES OF AMERICA, UNITED  
STATES DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, ALEX AZAR, in his  
Official Capacity as SECRETARY OF HEALTH  
AND HUMAN SERVICES, UNITED STATES  
INTERNAL REVENUE SERVICE, and DAVID  
J. KAUTTER, in his Official Capacity as Acting  
COMMISSIONER OF INTERNAL REVENUE,

Defendants.

CALIFORNIA, CONNECTICUT, DISTRICT OF  
COLUMBIA, DELAWARE, HAWAII,  
ILLINOIS, KENTUCKY, MASSACHUSETTS,  
MINNESOTA, NEW JERSEY, NEW YORK,  
NORTH CAROLINA, OREGON, RHODE  
ISLAND, VERMONT, VIRGINIA, AND  
WASHINGTON,

Proposed Intervenors-Defendants.

**MOTION FOR LEAVE TO APPEAR WITHOUT LOCAL COUNSEL**

TO THE HONORABLE REED C. O'CONNOR:

Intervenors-Defendants the States of California, Connecticut, District of Columbia,  
Delaware, Hawaii, Illinois, Kentucky, Massachusetts, Minnesota, New Jersey, New York, North

Carolina, Oregon, Rhode Island, Vermont, Virginia, and Washington respectfully seek this Court's leave to participate in this litigation without local counsel as required under N.D. Tex. R. 83.10(a).

## INTRODUCTION

1. Plaintiff Texas, represented by the Attorney General of Texas, and joined by Wisconsin, Alabama, Arkansas, Arizona, Florida, Georgia, Indiana, Kansas, Louisiana, Governor of Maine Paul LePage, Mississippi by and through Governor Phil Bryant, Missouri, Nebraska, North Dakota, South Carolina, South Dakota, Tennessee, Utah, and West Virginia, seek a declaration that the Patient Protection and Affordable Care Act (ACA) is unconstitutional, in whole or in part.

2. Defendants, who will be represented by the United States Department of Justice, are the United States of America, United States Department of Health and Human Services, Alex Azar, in his official capacity as Secretary of Health and Human Services, United States Internal Revenue Service, and David J. Kautter, in his official capacity as Acting Commissioner of Internal Revenue.

3. Under N.D. Tex. R. 83.11, an attorney appearing on behalf of the United States Justice Department or the Attorney General of the State of Texas is generally exempt from the local counsel requirement of N.D. Tex. R. 83.10.

4. Intervenors-Defendants seek to intervene due to their interest in protecting the ACA, which entitles them to receive billions of dollars for public health programs, while also decreasing the amount of money that the States must spend on healthcare costs for the uninsured.

5. Because the parties to this action will be exempt from the local counsel requirement, granting the same treatment to the Intervenors-Defendants will not deter from the Local Rule's goal of permitting the scheduling of hearings on short notice.

6. Accordingly, the Intervenors-Defendants respectfully seek leave to participate in this litigation without local counsel.

#### ARGUMENT AND AUTHORITIES

7. This case is unique in that parties to this action are exempt from the local rule requirement. Under N.D. Tex. R. 83.11 and unless the presiding judge directs otherwise, an attorney appearing on behalf of the United States Justice Department or the Attorney General of the State of Texas, and who is eligible pursuant to LR 83.9(a) to appear in this court, shall be exempt from the local counsel requirement of N.D. Tex. R. 83.10.

8. As such, no additional delay will result from granting the requested relief. As any hearing on short notice will require that other counsel also travel, no additional delay will come from counsel for the Intervenors-Defendants traveling to attend any hearing.

9. Moreover, counsel for the Intervenors-Defendants certify to the Court that they will be available for hearings called on short notice, including emergency hearings that may need to be held within twenty-four hours notice. Supervising Deputy Attorney General Kathleen Boergers and Deputy Attorney General Nimrod Elias each reside within 20 miles of two major airports: Oakland and San Francisco International airports, both of which have direct approximate three-hour and thirty minute flights to the Dallas/Fort Worth International Airport. Deputy Attorney General Neli Palma also lives within 20 miles of Sacramento International Airport which has direct approximate three-hour and fifteen minute flights to the Dallas/Fort Worth International Airport. They have each familiarized themselves with the Local Rules of the Northern District of Texas, and are prepared to abide by its rules and procedures.

10. As such, granting the relief requested will comport with the purpose of Rule 83.10 that counsel be present and available to argue a party's position at any hearing called by the presiding judge on short notice.

11. Although Local Rule 7.1(h) does not require a certificate of conference for this type of motion, counsel has conferred with counsel for Plaintiffs States regarding the relief requested here. The Plaintiff States do not oppose to this motion.

///

///

**PRAYER AND CONCLUSION**

Wherefore, for the foregoing reasons, movants respectfully request that the Court enter an Order allowing them to appear without local counsel. They also seek leave to seek pro hac vice admission for their counsel to the Northern District of Texas. A proposed order is attached to this motion and also will be emailed to Chambers in word-processing format.

Dated: April 9, 2018

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
JULIE WENG-GUTIERREZ  
Senior Assistant Attorney General  
KATHLEEN BOERGERS  
Supervising Deputy Attorney General  
NIMROD ELIAS  
Deputy Attorney General

/s/ Neli N. Palma  
NELI N. PALMA  
Deputy Attorney General  
California State Bar No. 203374  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 210-7522  
Fax: (916) 322-8288  
E-mail: Neli.Palma@doj.ca.gov

*Attorneys for Intervenor-Defendants*

GEORGE JEPSEN  
Attorney General of Connecticut  
JOSEPH R. RUBIN  
Associate Attorney General  
*Attorneys for Intervenor-Defendant the State of Connecticut*

MATTHEW P. DENN  
Attorney General of Delaware  
ILONA KIRSHON  
Deputy State Solicitor  
DAVID J. LYONS  
Deputy Attorney General  
*Attorneys for Intervenor-Defendant the State of Delaware*

RUSSELL A. SUZUKI  
Attorney General of Hawaii  
HEIDI M. RIAN  
Deputy Attorney General  
ROBERT T. NAKATSUJI  
Deputy Solicitor General  
*Attorneys for Intervenor-Defendant the  
State of Hawaii*

LISA MADIGAN  
Attorney General of Illinois  
DAVID F. BUYSSE  
Deputy Chief, Public Interest Division  
ANNA P. CRANE  
Public Interest Counsel  
MATTHEW V. CHIMENTI  
Assistant Attorney General, Special Litigation Bureau  
*Attorneys for Intervenor-Defendant the  
State of Illinois*

ANDY BESHEAR  
Attorney General of Kentucky  
LA TASHA BUCKNER  
Executive Director, Office of Civil and  
Environmental Law  
S. TRAVIS MAYO  
TAYLOR PAYNE  
Assistant Attorneys General  
*Attorneys for Intervenor-Defendant  
the Commonwealth of Kentucky*

MAURA HEALEY  
Attorney General of Massachusetts  
STEPHEN P. VOGEL  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
Commonwealth of Massachusetts*

*OFFICE OF THE ATTORNEY GENERAL*  
*State of Minnesota*  
SCOTT IKEDA  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the State of  
Minnesota by and through its Department of  
Commerce*

GURBIR S. GREWAL  
Attorney General of New Jersey  
JEREMY M. FEIGENBAUM  
Assistant Attorney General  
ANGELA JUNEAU BEZER  
Deputy Attorney General  
*Attorneys for Intervenor-Defendant the  
State of New Jersey*

ERIC T. SCHNEIDERMAN  
Attorney General of New York  
STEVEN C. WU  
Deputy Solicitor General  
LISA LANDAU  
Bureau Chief, Health Care Bureau  
ELIZABETH CHESLER  
Assistant Attorney General, Health Care Bureau  
*Attorneys for Intervenor-Defendant the  
State of New York*

JOSHUA H. STEIN  
Attorney General of North Carolina  
SRIPRIYA NARASIMHAN  
Deputy General Counsel  
*Attorneys for Intervenor-Defendant the  
State of North Carolina*

ELLEN F. ROSENBLUM  
Attorney General of Oregon  
HENRY KANTOR  
Special Counsel to the Attorney General  
SCOTT KAPLAN  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
State of Oregon*

PETER KILMARTIN  
Attorney General of Rhode Island  
MICHAEL W. FIELD  
Assistant Attorney General  
MARIA R. LENZ  
Special Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
State of Rhode Island*

THOMAS J. DONOVAN, JR.  
Attorney General of Vermont  
BENJAMIN D. BATTLES  
Solicitor General  
*Attorneys for Intervenor-Defendant the  
State of Vermont*

MARK R. HERRING  
Attorney General of Virginia  
TOBY J. HEYTENS  
Solicitor General  
MATTHEW R. MCGUIRE  
Deputy Solicitor General  
*Attorneys for Intervenor-Defendant the  
Commonwealth of Virginia*

ROBERT W. FERGUSON  
Attorney General of Washington  
JEFFREY G. RUPERT  
Chief, Complex Litigation Division  
JEFFREY T. SPRUNG  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
State of Washington*

KARL A. RACINE  
Attorney General for the District of Columbia  
ROBYN R. BENDER  
Deputy Attorney General  
VALERIE M. NANNERY  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
District of Columbia*

**DECLARATION OF NELI N. PALMA**

I, Neli N. Palma, declare:

1. I am an attorney at law in good standing licensed to practice in all Courts of the State of California. I have been appointed and currently serve as a Deputy Attorney General in the Office of the Attorney General, State of California. In this capacity, I have been assigned to appear on behalf of the Intervenors-Defendants in this matter. I have personal knowledge of the facts and would testify competently to those set forth herein.

2. I live within 20 miles of Sacramento International Airport which has direct approximate three-hour and fifteen minute flights to the Dallas/Fort Worth International Airport. I certify to the Court that I will be available for hearings called on short notice, including emergency hearings that may need to be held within twenty-four hours notice.

3. Supervising Deputy Attorney General Kathleen Boergers and Deputy Attorney General Nimrod Elias, who are also assigned to this case, each reside within 20 miles of two major airports: Oakland and San Francisco International airports, both of which have direct approximate three-hour and thirty minute flights to the Dallas/Fort Worth International Airport. They too are available to appear for hearings called on short notice, including emergency hearings that may need to be held within twenty-four hours notice.

4. Each of the deputies assigned to this case, including myself, have familiarized themselves with the Local Rules of the Northern District of Texas, and we are each prepared to abide by its rules and procedures.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was signed on this date in Sacramento, California. Executed on this 9th day of April, 2018, at Sacramento, California.



NELI N. PALMA

**CERTIFICATE OF CONFERENCE**

I hereby certify that on April 6, 2018, my Supervising Deputy Attorney General, Kathleen Boergers, conferred with Darren McCarty, counsel for the Plaintiff States concerning the Intervenors-Defendants' (1) Motion to Intervene, and (2) Motion for Leave to Appear without Local Counsel. During that conference, Mr. McCarty indicated that while he had no opposition to the Motion for Leave to Appear without Local Counsel, he would oppose the Motion to Intervene. No conference was held with counsel for the Defendants to determine their position as to the motions since they have not yet appeared.

Dated: April 9, 2018

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
JULIE WENG-GUTIERREZ  
Senior Assistant Attorney General  
KATHLEEN BOERGERS  
Supervising Deputy Attorney General  
NIMROD P. ELIAS  
Deputy Attorney General

/s/ Neli N. Palma  
NELI N. PALMA  
Deputy Attorney General  
California State Bar No. 203374  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 210-7522  
Fax: (916) 322-8288  
E-mail: Neli.Palma@doj.ca.gov

*Attorneys for Intervenors-Defendants*

Dated: April 9, 2018

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
JULIE WENG-GUTIERREZ  
Senior Assistant Attorney General  
KATHLEEN BOERGERS  
Supervising Deputy Attorney General  
NIMROD ELIAS  
Deputy Attorney General

/s/ Neli N. Palma  
NELI N. PALMA  
Deputy Attorney General  
California State Bar No. 203374  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 210-7522  
Fax: (916) 322-8288  
E-mail: Neli.Palma@doj.ca.gov

*Attorneys for Intervenor-Defendants*

GEORGE JEPSEN  
Attorney General of Connecticut  
JOSEPH R. RUBIN  
Associate Attorney General  
*Attorneys for Intervenor-Defendant the State of Connecticut*

MATTHEW P. DENN  
Attorney General of Delaware  
ILONA KIRSHON  
Deputy State Solicitor  
DAVID J. LYONS  
Deputy Attorney General  
*Attorneys for Intervenor-Defendant the State of Delaware*

RUSSELL A. SUZUKI  
Attorney General of Hawaii  
HEIDI M. RIAN  
Deputy Attorney General  
ROBERT T. NAKATSUJI  
Deputy Solicitor General  
*Attorneys for Intervenor-Defendant the State of Hawaii*

LISA MADIGAN  
Attorney General of Illinois  
DAVID F. BUYSSE  
Deputy Chief, Public Interest Division  
ANNA P. CRANE  
Public Interest Counsel  
MATTHEW V. CHIMENTI  
Assistant Attorney General, Special Litigation Bureau  
*Attorneys for Intervenor-Defendant the  
State of Illinois*

ANDY BESHEAR  
Attorney General of Kentucky  
LA TASHA BUCKNER  
Executive Director, Office of Civil and  
Environmental Law  
S. TRAVIS MAYO  
TAYLOR PAYNE  
Assistant Attorneys General  
*Attorneys for Intervenor-Defendant  
the Commonwealth of Kentucky*

MAURA HEALEY  
Attorney General of Massachusetts  
STEPHEN P. VOGEL  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
Commonwealth of Massachusetts*

*OFFICE OF THE ATTORNEY GENERAL*  
*State of Minnesota*  
SCOTT IKEDA  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the State of  
Minnesota by and through its Department of  
Commerce*

GURBIR S. GREWAL  
Attorney General of New Jersey  
JEREMY M. FEIGENBAUM  
Assistant Attorney General  
ANGELA JUNEAU BEZER  
Deputy Attorney General  
*Attorneys for Intervenor-Defendant the  
State of New Jersey*

ERIC T. SCHNEIDERMAN  
Attorney General of New York  
STEVEN C. WU  
Deputy Solicitor General  
LISA LANDAU  
Bureau Chief, Health Care Bureau  
ELIZABETH CHESLER  
Assistant Attorney General, Health Care Bureau  
*Attorneys for Intervenor-Defendant the  
State of New York*

JOSHUA H. STEIN  
Attorney General of North Carolina  
SRIPRIYA NARASIMHAN  
Deputy General Counsel  
*Attorneys for Intervenor-Defendant the  
State of North Carolina*

ELLEN F. ROSENBLUM  
Attorney General of Oregon  
HENRY KANTOR  
Special Counsel to the Attorney General  
SCOTT KAPLAN  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
State of Oregon*

PETER KILMARTIN  
Attorney General of Rhode Island  
MICHAEL W. FIELD  
Assistant Attorney General  
MARIA R. LENZ  
Special Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
State of Rhode Island*

THOMAS J. DONOVAN, JR.  
Attorney General of Vermont  
BENJAMIN D. BATTLES  
Solicitor General  
*Attorneys for Intervenor-Defendant the  
State of Vermont*

MARK R. HERRING  
Attorney General of Virginia  
TOBY J. HEYTENS  
Solicitor General  
MATTHEW R. MCGUIRE  
Deputy Solicitor General  
*Attorneys for Intervenor-Defendant the  
Commonwealth of Virginia*

ROBERT W. FERGUSON  
Attorney General of Washington  
JEFFREY G. RUPERT  
Chief, Complex Litigation Division  
JEFFREY T. SPRUNG  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
State of Washington*

KARL A. RACINE  
Attorney General for the District of Columbia  
ROBYN R. BENDER  
Deputy Attorney General  
VALERIE M. NANNERY  
Assistant Attorney General  
*Attorneys for Intervenor-Defendant the  
District of Columbia*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

Texas, et al. \_\_\_\_\_  
Plaintiff  
§  
§  
§  
§  
v. \_\_\_\_\_  
Case No. 4:18-cv-00167-O  
§  
§  
§  
§  
United States of America, et al. \_\_\_\_\_  
Defendant  
§

**APPLICATION FOR ADMISSION PRO HAC VICE**  
(Complete all questions; indicate "N/A" if necessary.)

I. Applicant is an attorney and a member of the law firm of (or practices under the name of)  
California Department of Justice, Office of the Attorney General \_\_\_\_\_, with offices at  
1515 Clay Street, 20th Floor \_\_\_\_\_  
(Street Address)  
Oakland \_\_\_\_\_ CA \_\_\_\_\_ 94612 \_\_\_\_\_  
(City) (State) (Zip Code)  
510-879-0011 \_\_\_\_\_ 510-622-2270 \_\_\_\_\_  
(Telephone No.) (Fax No.)

II. Applicant will sign all filings with the name Kathleen M. Boergers \_\_\_\_\_

III. Applicant has been retained personally or as a member of the above-named firm by:

(List All Parties Represented)

State of California

to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the Northern District of Texas.

IV. Applicant is a member in good standing of the bar of the highest court of the state of  
California, where Applicant regularly practices law.

Bar license number: 213530 Admission date: 06/01/2001

For Court Use Only.  
Bar Status Verified:  
\_\_\_\_\_

Attach to this application an original certificate of good standing issued within the past 90 days from the attorney licensing authority in a state in which you are admitted to practice (e.g., State Bar of Texas).

V. Applicant has also been admitted to practice before the following courts:

Court:	Admission Date:	Active or Inactive:
<u>U.S. Court of Appeals, Ninth Circuit</u>	<u>March 8, 2005</u>	<u>Active</u>
<u>U.S.D.C. Northern District of CA</u>	<u>July 18, 2002</u>	<u>Active</u>
<u>U.S.D.C. Eastern District of CA</u>	<u>June 18, 2003</u>	<u>Active</u>

VI. Applicant has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline, except as provided below:

Not applicable.

VII. Applicant has never been subject to grievance proceedings or involuntary removal proceedings—regardless of outcome—while a member of the bar of any state or federal court or tribunal that requires admission to practice, except as provided below:

Not applicable.

VIII. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

Not applicable.

**IX.** Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years in the following matters:

Date of Application: Case No. And Style:

Not Applicable.

(If necessary, attach statement of additional applications.)

X. Local counsel of record associated with Applicant in this matter is:

\_, who has offices at

(Street Address)

(City)

(State)

(Zip Code)

(Telephone No.)

(Facsimile No.)

**XI.** Check the appropriate box below.

### For Application in a Civil Case

Applicant has read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex. 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.

**For Application in a Criminal Case**

Applicant has read and will comply with the local criminal rules of this court.

XII. Applicant respectfully requests to be admitted to practice in the United States District Court for the Northern District of Texas for this cause only. Applicant certifies that a true and correct copy of this document has been served upon each attorney of record and the original upon the clerk of court, accompanied by a \$25.00 filing fee, on this the 9 day of April, 2018.

Kathleen M. Boergers

Printed Name of Applicant

Kathleen Boag



**THE STATE BAR  
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

**CERTIFICATE OF STANDING**

April 6, 2018

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KATHLEEN MARIE BOERGERS, #213530 was admitted to the practice of law in this state by the Supreme Court of California on June 1, 2001; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Denise Velasco  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

Texas, et al.

*Plaintiff*

§  
§  
§  
§  
§  
§  
§  
§

v.

Case No. 4:18-cv-00167-O

United States of America, et al.

*Defendant*

§  
§  
§  
§

**APPLICATION FOR ADMISSION *PRO HAC VICE***

(Complete all questions; indicate "N/A" if necessary.)

I. Applicant is an attorney and a member of the law firm of (or practices under the name of)

California Department of Justice, Office of the Attorney General, with offices at

1300 I Street, 12th Floor

(Street Address)

Sacramento  
(City)

CA  
(State)

95814  
(Zip Code)

916-210-7522  
(Telephone No.)

916-322-8288  
(Fax No.)

II. Applicant will sign all filings with the name Neli N. Palma.

III. Applicant has been retained personally or as a member of the above-named firm by:

(List All Parties Represented)

California, Connecticut, Delaware, Hawaii, Illinois, Kentucky, Massachusetts, New Jersey, New York, North Carolina, Oregon, Rhode Island, Vermont, Virginia, Washington, District of Columbia.

to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the Northern District of Texas.

IV. Applicant is a member in good standing of the bar of the highest court of the state of California, where Applicant regularly practices law.

Bar license number: 203374 Admission date: 12/6/1999

For Court Use Only.  
Bar Status Verified:  
\_\_\_\_\_

**Attach to this application an original certificate of good standing issued within the past 90 days from the attorney licensing authority in a state in which you are admitted to practice (e.g., State Bar of Texas).**

V. Applicant has also been admitted to practice before the following courts:

Court:	Admission Date:	Active or Inactive:
<u>U.S. Court of Appeals, Ninth Circuit</u>	<u>01/06/00</u>	<u>Active</u>
<u>U.S.D.C. Northern District of CA</u>	<u>12/06/99</u>	<u>Active</u>
<u>U.S.D.C. Eastern District of CA</u>	<u>01/08/09</u>	<u>Active</u>

VI. Applicant has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline, except as provided below:

Not applicable.

VII. Applicant has never been subject to grievance proceedings or involuntary removal proceedings—regardless of outcome—while a member of the bar of any state or federal court or tribunal that requires admission to practice, except as provided below:

Not applicable.

VIII. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

Not applicable.

**IX.** Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years in the following matters:

Date of Application: Case No. And Style:

Not Applicable. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(If necessary, attach statement of additional applications.)

**X.** Local counsel of record associated with Applicant in this matter is

\_\_\_\_\_, who has offices at

(Street Address)

(City) \_\_\_\_\_ (State) \_\_\_\_\_ (Zip Code) \_\_\_\_\_

(Telephone No.) \_\_\_\_\_ (Facsimile No.) \_\_\_\_\_

**XI.** Check the appropriate box below.

For Application in a **Civil Case**



Applicant has read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex. 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.

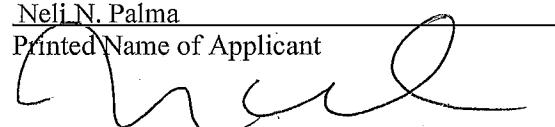
For Application in a **Criminal Case**



Applicant has read and will comply with the local criminal rules of this court.

**XII.** Applicant respectfully requests to be admitted to practice in the United States District Court for the Northern District of Texas for this cause only. Applicant certifies that a true and correct copy of this document has been served upon each attorney of record and the original upon the clerk of court, accompanied by a \$25.00 filing fee, on this the 9 day of April 2018.

Nelj N. Palma  
Printed Name of Applicant

  
Signature



# THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

April 6, 2018

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, NELI NIMA PALMA, #203374 was admitted to the practice of law in this state by the Supreme Court of California on December 6, 1999; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Denise Velasco  
Custodian of Membership Records

*Certificate of Service*

On April 9, 2018, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

s/Michelle Schoenhardt

Michelle Schoenhardt